

DOCKET FILE COPY (OTTERDA)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matters of)
)
Federal-State Joint Board on)
Universal Service)
)
Updating Line Count Data)

CC Docket No. 96-45

RECEIVED

AUG 11 2000

FCC MAIL ROOM

COMMENTS

BellSouth Corporation, on behalf of itself and its subsidiaries ("BellSouth"), hereby submits its Comments in response to the Public Notice released by the Common Carrier Bureau on July 24, 2000.¹ The public notice solicits comments to assist the Commission in its determination as to whether it should update the line count data for wire centers that receive universal service support.

Conceptually, BellSouth has no objection to updating line count information. Nevertheless, to the extent that the Commission would require such information be provided on a class of service basis, the Commission must be aware that such information is competitively sensitive and if released to the public would place BellSouth at a competitive disadvantage vis à vis its competitors. Because of its competitively sensitive nature, BellSouth has always treated its class of service information as confidential business information and, accordingly, has not publicly disclosed such information. BellSouth would expect the Commission to recognize the

¹ *Common Carrier Bureau Seeks Comment On Updating Line Counts for Calculating High-Cost Universal Service Support for Non-Rural Carriers for the Year 2001*, Public Notice, DA 00-1626, released July 24, 2000.

No. of Copies rec'd 0
File # 1000000

competitive nature of class of service information and withhold any such information from public disclosure. Indeed, because BellSouth believes that the adverse competitive consequences of disclosure would far outweigh any benefit that would be obtained from updating line count information, BellSouth would not recommend updating the line count information, if the Commission is unwilling to maintain the confidentiality of this competitively sensitive information.

Respectfully submitted,

BELLSOUTH CORPORATION

By: /s/ Richard M. Sbaratta
M. Robert Sutherland
Richard M. Sbaratta

Its Attorneys
Suite 1700
1155 Peachtree Street, N. E.
Atlanta, Georgia 30306-3610
404) 249-3386

Date: August 8, 2000

CERTIFICATE OF SERVICE

I do hereby certify that I have this 8th day of August 2000 served the following parties to this action with a copy of the foregoing **COMMENTS** by sending a electronic version or by placing a true and copy of the same in the United States Mail, postage prepaid, addressed to the parties on the attached service list.

/s/ Linda L. Williams

Linda L. Williams

Service List CC Docket No. 96-45

*Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room TW-A325
Washington, D. C. 20554

The Honorable William E. Kennard
Chairman
Federal Communications Commission
The Portals, 445 Twelfth Street, S. E.
Room 8-B201
Washington, D. C. 20554

The Honorable Michael Powell
Commissioner
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 8-A204
Washington, D. C. 20554

The Honorable Gloria Tristani
Commissioner
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 8-C302
Washington, D. C. 20554

The Honorable Harold Furchtgott-Roth
Commissioner
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 8-A302
Washington, D. C. 20554

The Honorable Susan Ness
Commissioner
Federal Communications Commission
The Portals, 445 Twelfth Street, S.E.
Room 8-B115
Washington, D. C. 20554

The Honorable Laska Schonefelder
Commissioner
South Dakota Public Utilities Commission
State Capitol, 500 East Capitol Street
Pierre, SD 57501-5070

Martha S. Hogerty
Missouri Office Public Counsel
301 West High Street, Suite 250
Truman Building, P. O. Box 7800
Jefferson City, MO 65102

Joe Garcia, Chairman
Florida Public Service Commission
2540 Sumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0866

Pat Wood, III
Chairman
Texas Public Utility Commission
1701 North Congress Avenue
P. O. Box 13326
Austin, TX 78711

Bob Rowe
Commissioner
Montana Public Service Commission
1701 Prospect Avenue
P. O. Box 202601
Helena, MT 59620-2601

Sheryl Todd
Accounting Division-Common Carrier Bur
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 5-B540
Washington, D. C. 20554

*International Transcription Services
The Portals, 445 12th Street, S. W.
Suite CY-B400
Washington, D. C. 20554

*** VIA ELECTRONIC FILING**